

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. )  
VLADISLAV KLYUSHIN, )  
a/k/a “Vladislav Kliushin” )  
IVAN ERMAKOV, )  
a/k/a “Ivan Yermakov”, and )  
NIKOLAI RUMIANTCEV, )  
a/k/a “Nikolay Rumyantcev” )  
Defendants. )  
Criminal No. 21-10104-PBS

## GOVERNMENT'S PROPOSED VOIR DIRE

The government respectfully requests that the Court pose the following questions to prospective jurors:

### General Questions

1. This trial is expected to last between two and three weeks, and to end before the school vacation week that begins on February 20. Are there any family, work, or personal health issues that would make it difficult for you to concentrate on the proceedings in court or otherwise difficult for you to sit as a juror?
2. Do you need special accommodations to allow you to see, hear, or understand the proceedings?
3. What is the highest level of education you have completed?
4. The attorneys for the government are Stephen Frank and Seth Kosto. Does anyone know the attorneys for the government or anyone associated with the U.S. Attorney's Office?
5. The defendant is Vladislav Klyushin and his attorneys are Maksim Nemtsev and Marc Fernich. Does anyone know the defendant or his attorneys?

6. Have you previously served on a jury? If so, was it a criminal or civil case? Did the jury reach a verdict?

7. If you have ever been a juror, was there anything about that experience that would make it difficult for you to be fair and impartial in this case?

8. Have you seen anything in the news media or online regarding this case, and if so, have you formed an opinion about this case based on that coverage?

*Questions Identifying Bias*

9. The defendant is a citizen of Russia. Is there anything about the defendant's national origin that would cause you to believe you could not be fair and decide this case on the evidence that is presented to you?

10. Some of the witnesses who might be called to testify are employed by the Federal Bureau of Investigation (also known as the FBI) and the Securities and Exchange Commission (also known as the SEC). Have you, or any member of your immediate family, or anyone with whom you are close, ever been investigated, interviewed, or audited by, either of these agencies, or had any other involvement with them?

11. Do you have any beliefs or feelings regarding federal or state government or law enforcement that would affect your ability to evaluate and judge fairly and impartially the facts of this case?

12. Have you, any member of your immediate family, or anyone with whom you are close, ever been arrested, charged with a crime, or otherwise involved in a criminal proceeding in any way, including as a defendant, victim, or witness?

13. Have you or any member of your immediate family worked for a law enforcement agency or prosecutor's office, or for a criminal defense attorney or public defender's office?

14. Do you have any religious, ethical, moral or philosophical beliefs that would make it difficult for you to sit in judgment on another person?

15. Do you have any concerns about the criminal justice system in general that might affect your ability to consider the evidence in this case fairly and impartially?

Questions About the Nature of the Case

16. In this case, the defendant is charged with conspiracy, securities fraud, wire fraud and unauthorized access to computers. Is there anything about the nature of the charges that causes you to believe that you cannot sit as a fair and impartial juror in this case?

Questions About Following the Law

17. Will you follow the instructions of law that the Court will give you at the close of the case regardless of whether you agree with the instructions or not?

18. Would you disobey the judge's instructions on the law simply because they are different from your own understanding of what the law is or should be?

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

/s/ Stephen E. Frank  
STEPHEN E. FRANK  
SETH B. KOSTO  
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I, Stephen E. Frank, hereby certify that this document was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF").

Date: January 16, 2023

/s/ Stephen E. Frank  
Stephen E. Frank